

ROBERT E. BELSHAW (CABN 142028)
1208 Vincente Street
San Francisco, California 94116
Telephone: (415) 956-9590
Email: rob@belshawlaw.com

Attorney for Plaintiff

MELINDA HAAG (CABN 132612)
United States Attorney
ALEX G. TSE (CABN 152348)
Chief, Civil Division
ABRAHAM A. SIMMONS (CABN 146400)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7264
FAX: (415) 436-7234
Abraham.simmons@usdoj.gov

Attorneys for Federal Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN SMALL BUSINESS LEAGUE,)	CASE NO. CV 14-2168 VC
)	
Plaintiff,)	SECOND STIPULATION REGARDING
)	BRIEFING SCHEDULE FOR PLAINTIFF'S
v.)	PETITION RE ATTORNEY'S FEES;
)	PROPOSED ORDER
UNITED STATES DEPARTMENT OF THE)	
ARMY)	
)	Motion Hearing Date: March 12, 2015
Defendant.)	Time: 10:00 a.m.
)	Place: Courtroom 4, 17 th Fl.
)	Before: Hon. Vince Chhabria

STIPULATION

Whereas, Plaintiff American Small Business League ("Plaintiff") filed this action pursuant to the Freedom of Information Act on May 12, 2014;

Whereas, Plaintiff and Defendant United States Department of the Army (collectively, "the Parties")

STIPULATION EXTENDING TIME TO FILE OPPOSITION
AMERICAN SMALL BUSINESS LEAGUE V. ARMY
CV 14-2168 VC

1 filed a Joint Motion to Dismiss the matter on January 7, 2015 and this Court filed an Order granting the
2 motion on January 8, 2015;

3 Whereas, Plaintiff filed a Petition for Attorney's fees on January 20, 2015 in order to get the motion
4 on file prior to the deadline notwithstanding Plaintiff's counsel's plan to be on vacation in the last two
5 weeks of January;

6 Whereas, Plaintiff scheduled the hearing on the Petition for March 12, 2015, in part to allow the
7 Parties additional time to meet and confer regarding attorney's fees;

8 Whereas, the Parties have conferred and agree in principle on a procedure to for resolving the
9 Petition and request and additional 48 hours to either reach agreement or present Plaintiff's petition to
10 the Court;

11 The Parties hereby **Agree and Stipulate** and respectfully request the Court to extend the time for
12 Defendant to respond to the petition until February 19, 2015.

13
14 LAW OFFICE OF ROBERT E. BELSHAW

MELINDA HAAG
United States Attorney

15
16 s/ Robert Belshaw
17 ROBERT E. BELSHAW
Attorney for Plaintiff

s/ Abraham Simmons
ABRAHAM SIMMONS
Assistant United States Attorney
Attorneys for Federal Defendant

18
19
20 **PROPOSED ORDER**

21 The stipulation is approved. Defendant shall file its opposition to Plaintiff's petition for
22 attorney's fees on or before February 19, 2015. The date of the hearing shall not be changed.

23
24 **IT IS SO ORDERED.**

25 Dated: February 18, 2015



26 The Honorable Vince Chhabria
United States District Judge